

## EXHIBIT C

Pollack v. Gordon

From: Maria Patelis (m.patelis@aol.com)  
To: brian@fairlabordefense.com; david@kaselllawfirm.com  
Date: Thursday, December 19, 2024 at 05:50 PM CST

Please see attached.

<https://recordpress.sharefile.com/public/share/web-sa6ad93f510514075bc8438b24c3e6ae2>

Since you did not respond to my last email I added this production to the prior responses. Further, note my prior objections again and provide me with three dates so I can depose your client for January as discussed in Court.

Best regards,

Maria Patelis, Esq.  
Maria Patelis & Associates, PLLC.  
7024 18th Avenue  
Brooklyn, New York 11204

9732 3rd Avenue  
Brooklyn, New York 11209  
917-653-7214

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GORDON DECLARATION FULLY EXECUTED.pdf  
145.6kB

Pollack v. Gordon

From: Maria Patelis (m.patelis@aol.com)  
To: david@kaselllawfirm.com; brian@fairlabordefense.com  
Date: Wednesday, January 15, 2025 at 05:05 PM CST

Hello,

I have sent numerous emails regarding the deposition of your client. It was addressed at the Court appearance. Please provide me with three dates that he is available, otherwise I will have no choice but to address this with the Court.

Thank you.

Best regards,

Maria Patelis, Esq.  
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Please let me know when you would like to meet and confer

Brian

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**From:** Brian Lehman <brian@fairlabordefense.com>  
**Sent:** Thursday, January 30, 2025 9:21 AM  
**To:** Maria Patelis <m.patelis@aol.com>; David Kasell <david@kaselllawfirm.com>  
**Subject:** Re: Pollack v. Gordon

That's correct: Mr. Pollack will not be in New York in February.

When would you like to meet and confer?

Brian

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**From:** Maria Patelis <m.patelis@aol.com>  
**Sent:** Wednesday, January 29, 2025 4:54 PM  
**To:** David Kasell <david@kaselllawfirm.com>; Brian Lehman <brian@fairlabordefense.com>  
**Subject:** Re: Pollack v. Gordon

I will confirm dates with my client and get back to you tomorrow. Is he in New York at all during this time? We accommodated your request to depose my client in person and you have yet to serve me with a transcript. Is there a reason you are not turning it over?

Best regards,

Maria Patelis, Esq.  
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On Wednesday, January 29, 2025 at 08:25:44 AM CST, Brian Lehman <brian@fairlabordefense.com> wrote:

Re: Pollack v. Gordon

From: Brian Lehman (brian@fairlabordefense.com)

To: m.patelis@aol.com; david@kaselllawfirm.com

We can do a video deposition in February on these days:

February 3, 4, 5, 6, 11, 13, 17, 18, or 19th.

Brian

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**From:** Brian Lehman <brian@fairlabordefense.com>  
**Sent:** Wednesday, January 29, 2025 8:29 AM  
**To:** Maria Patelis <m.patelis@aol.com>; David Kasell <david@kaselllawfirm.com>  
**Subject:** Re: Pollack v. Gordon

Could you give some suggested times? What time works for you?

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**From:** Brian Lehman <brian@fairlabordefense.com>  
**Sent:** Tuesday, January 28, 2025 12:16 PM  
**To:** Maria Patelis <m.patelis@aol.com>; David Kasell <david@kaselllawfirm.com>  
**Subject:** Re: Pollack v. Gordon

Sure — when would you like to talk? Just give a suggestion. As we noted, we believe you should as you agreed to before just do a video deposition because even when in the US he is in Florida.

But give us a time to talk, and we can also meet and confer on your client's refusal to turn over the documents request so that the court can decide on that as well.

When would you like to talk?

Brian

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**From:** Maria Patelis <m.patelis@aol.com>  
**Sent:** Monday, January 27, 2025 3:53 PM  
**To:** David Kasell <david@kaselllawfirm.com>; Brian Lehman <brian@fairlabordefense.com>  
**Subject:** Re: Pollack v. Gordon

Are you able to meet and confer before I contact the Court, and what dates is he available. I have send multiple emails regarding this, if he is out of the country there is time issue.

Let me know as soon as possible.

Best regards,

Maria Patelis, Esq.  
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On Friday, January 24, 2025 at 10:48:39 AM CST, Brian Lehman <brian@fairlabordefense.com> wrote:

As the complaint states, our client lives in Florida when he is in the U.S. If you'd like to have it be in-person, please file a motion to compel so that the court may resolve it. You previously agreed to video deposition and we will raise that with the court. I'm sure the court will give a fair decision.

Brian Lehman

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**From:** Maria Patelis <m.patelis@aol.com>  
**Sent:** Thursday, January 23, 2025 10:47 AM  
**To:** Brian Lehman <brian@fairlabordefense.com>; David Kasell <david@kasellawfirm.com>  
**Subject:** Re: Pollack v. Gordon

Hi,

That is not relevant because I did not have your responses to the demands. When will he be returning? You were aware of this request to schedule since our last Court appearance.

Best regards,

Maria Patelis, Esq.  
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On Thursday, January 16, 2025 at 10:32:04 AM CST, David Kasell <david@kasellawfirm.com> wrote:

Maria,

As you know, we had confirmed, scheduled and prepared for a deposition of Mr. Pollack in November, but you canceled it.

Mr. Pollack is not in the country at this time, but we are still willing to agree to a video deposition, which you agreed to before. We see no reason why you should not abide by your agreement. Please provide 3 dates on which you would like to take the video deposition and we will confirm with Mr. Pollack as to which one works.